POMPANO SENIOR SQUADRON FLYING CLUB, INC., a Florida corporation,

Plaintiff,

V

CARL KENNEDY, individually,

Defendant.

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN AND FOR ROWARD COUNTY FLORIDA

CASE NO.: CACE 20-005993 (08)

PLAINTIFF'S MOTION TO COMPEL

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC. (Plaintiff "Club"), by and through its undersigned counsel, pursuant to Rule 1.350, Fla. R. Civ. P. files this Motion to Compel against Defendant CARL KENNEDY (Defendant "Kennedy") and says:

- 1. Plaintiff Club propounded a Request to Produce to Defendant Kennedy on or about July 27, 2020. Pursuant to Rule 1.350, Fla. R. Civ. P., Defendant Kennedy's responses to the Request to Produce were due on or about August 28, 2020.
- 2. Defendant Kennedy filed a Motion for Extension of Time as to the Request to Produce until after September 1, 2020. The time to respond, even based upon Defendant Kennedy's Motion for Extension of Time has expired.

WHEREFORE, Plaintiff Club moves this Honorable Court for an Order compelling Defendant Kennedy's response, without objections, to Plaintiff Club's Request to Produce, an award of Court costs and attorney fees, and any further relief that this Court deems just and equitable.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 1st day of October 2020, to Carl L. Kennedy, II, clktax@aol.com.

/s/Edward F. Holodak EDWARD F. HOLODAK, ESQ. Attorney for Plaintiff Fla. Bar No.: 059234 Edward F. Holodak, P.A. 7951 SW 6th Street, Ste. 210 Plantation, FL 33324 Tel.: 954-927-3436

pleadings@holodakpa.com